



**MEMO ENDORSED**

July 15, 2020

Hon. Katherine Polk Failla  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Brent Borland, 18 Cr. 487 (KPF)**

Dear Judge Failla,

I write to request a brief extension of the due date for Mr. Borland's reply to the government's July 8 response to our June 16 Supplemental Memorandum in Support of Mr. Borland's argument that application of the "credit for loss" provision set forth in Application Note 3(E) (ii) to USSG § 2B1.1 applies in his case. I apologize for the late hour of this request, but during the last 24 hours we have experienced some communication difficulties with our client (given that everyone is working remotely) that have impeded completion of the memorandum, and we therefore respectfully ask for an additional two days to file our submission.

The government consents to this request.

Thank you for your consideration.

Respectfully submitted,

/s/

Florian Miedel  
*Attorney for Brent Borland*

Cc: All Counsel

Application GRANTED.

SO ORDERED.

Dated: July 15, 2020  
New York, New York

A handwritten signature in blue ink that reads "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE